

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Antoinette R. Byrd fka Antoinette R. Alexander
Debtor(s)

CHAPTER 13

Specialized Loan Servicing, LLC, as servicer for
Deutsche Bank National Trust Company, as Trustee for
FFMLT Trust 2006-FF4, Mortgage Pass Through
Certificates, Series 2006-FF4

NO. 21-11248 AMC

Movant

vs.

Antoinette R. Byrd fka Antoinette R. Alexander
Debtor(s)

11 U.S.C. Section 362

Scott F. Waterman

Trustee

**MOTION OF SPECIALIZED LOAN SERVICING, LLC, AS SERVICER FOR
DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FFMLT TRUST
2006-FF4, MORTGAGE PASS THROUGH CERTIFICATES, SERIES 2006-FF4
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

1. Movant is Specialized Loan Servicing, LLC, as servicer for Deutsche Bank National Trust Company, as Trustee for FFMLT Trust 2006-FF4, Mortgage Pass Through Certificates, Series 2006-FF4.

2. Debtor(s) is/are the owner(s) of the premises 4453 Sherwood Road, Philadelphia, PA 19131, hereinafter referred to as the mortgaged premises.

3. Movant is the holder of a mortgage, original principal amount of \$137,800.00 on the mortgaged premises that was executed on December 30, 2005. The mortgage has been assigned as follows:

(MERS), Mortgage Electronic Registration Systems, Inc. to Deutsche Bank National Trust Company, as Trustee for FFMLT 2006-FF4, Mortgage Pass-Through Certificates, Series 2006-FF4 filed on October 12, 2007 at Document ID Number 51789622.

4. Scott F. Waterman, is the Trustee appointed by the Court.

5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).

6. Debtor(s) has/have failed to make the monthly post-petition mortgage payments in the amount of \$1,512.28 for the months of May 2021 through August 2021 plus late charges if applicable.

7. The total amount necessary to reinstate the loan post-petition is \$6,049.12.
8. Movant is entitled to relief from stay for cause.
9. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Rebecca A. Solarz, Esq.

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